

# Exhibit J

# Nelson Mullins

## Nelson Mullins Riley & Scarborough LLP

Attorneys and Counselors at Law

Atlantic Station / 201 17th Street, NW / Suite 1700 / Atlanta, GA 30363

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Matthew B. Lerner

(Admitted in GA & FL)

Tel: 404.322.6158

matthew.lerner@nelsonmullins.com

April 8, 2013

<b><u>Via Federal Express</u></b> Troy A. Brenes, Esq. Lopez McHugh LLP 100 Bayview Circle, Suite 5600 Newport Beach, CA 92660	<b><u>Via Federal Express</u></b> John A. Dalimonte, Esq. Karon & Dalimonte LLP 85 Devonshire Street, Suite 1000 Boston, MA 02109
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**Re: Bard IVC Filter Litigation  
Native File Production**

Dear Counsel:

Enclosed, please find a disc that contains 575 documents that are being produced:

- BPVE-01-00002182 - BPVEFILTER-01-00014813

These documents are being produced as the first overlay production of Native files for spreadsheets and powerpoints that had previously been produced.

Sincerely,



Matthew B. Lerner

MBL:ew

Enclosure

cc: Richard B. North, Jr., Esq. (*via electronic mail and w/o enclosure*)  
Taylor T. Daly, Esq. (*via electronic mail and w/o enclosure*)  
James F. Rogers, Esq. (*via electronic mail and w/o enclosure*)  
Julia Reed Zaic, Esq. (*via electronic mail and w/o enclosure*)

## Nelson Mullins

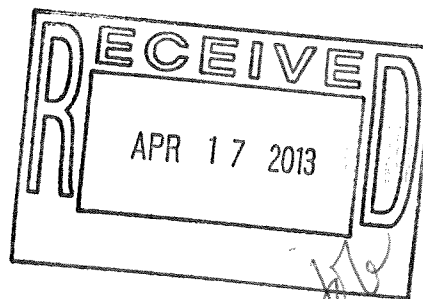
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April 16, 2013

#### Via Federal Express

Troy A. Brenes, Esq.

Lopez McHugh LLP

100 Bayview Circle, Suite 5600

Newport Beach, CA 92660

#### Via Federal Express

John A. Dalimonte, Esq.

Karon & Dalimonte LLP

85 Devonshire Street, Suite 1000

Boston, MA 02109

**Re: Bard IVC Filter Litigation  
Native File Production**

Dear Counsel:

Enclosed, please find a hard drive that contains 29,148 native file documents that are being produced as an additional overlay production of native files for spreadsheets and PowerPoints that had previously been produced. These documents are being produced in your Bard IVC filter cases where protective orders have been entered.

Sincerely,

Matthew B. Lerner

MBL:mn5

Enclosure

cc: Richard B. North, Jr., Esq. (*via electronic mail and w/o enclosure*)  
Taylor T. Daly, Esq. (*via electronic mail and w/o enclosure*)  
James F. Rogers, Esq. (*via electronic mail and w/o enclosure*)  
Julia Reed Zaic, Esq. (*via electronic mail and w/o enclosure*)

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Matthew B. Lerner

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October 14, 2016

### VIA FEDERAL EXPRESS

Ramon Rossi Lopez, Esq.  
Lopez McHugh LLP  
100 Bayview Circle, Suite 5600  
Newport Beach, CA 92660

Robert W. Boatman, Esq.  
Paul Stoller, Esq.  
Gallagher & Kennedy, PA  
2575 E. Camelback Rd., Suite 1100  
Phoenix, AZ 85016

Re: MDL No. 2641, *In re: Bard IVC Filters Products Liability Litigation*  
Supplemental Production

Dear Counsel,

Enclosed, please find a hard drive with documents Bard is producing in the above-referenced matter, which have been bates labeled as follows:

- BPVEFILTER-28-00000001 through BPVEFILTER-28-00615443
- BPVEFILTER-30-00000001 through BPVEFILTER-30-00385078
- BPVEFILTER-32-00000001 through BPVEFILTER-32-00008924
- BPVEFILTER-34-00000001 through BPVEFILTER-34-00022290

These documents are being produced subject to Case Management Order 17.

Sincerely,



Matthew B. Lerner

MBL:me

Enclosure

cc: Richard B. North, Jr., Esq.

**Niki Patel**

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**From:** Matthew Lerner  
**Sent:** Saturday, October 22, 2016 9:51 PM  
**To:** 'Scheehle, Karin M.'; 'Boatman, Robert W.'; 'rlopez@lopezmchugh.com'; 'Stoller, Paul L.'; 'Wendy Espitia' (wespitia@lopezmchugh.com); 'Marilyn Wass (mwass@lopezmchugh.com)'; 'mjones@lopezmchugh.com'; 'agarrett@lopezmchugh.com'; 'mlopez@lopezmchugh.com'; 'alopez@lopezmchugh.com' (alopez@lopezmchugh.com)  
**Cc:** Richard North; Mark Nash; Carrie Brown; Dennis Hom; Matthew Lerner; Mandy Evangelista  
**Subject:** RE: In Re: Bard IVC Filters Products Liability Litigation - Bard Production (BPVEFILTER-35-00000001- BPVEFILTER-35-00116876; BPV-17-01-00261495)  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

All,

Below please find a link to additional documents Bard is producing today. These documents are being produced subject to Case Management Order 17.

FTP Link: : <https://biaprotect.box.com/s/fkq3ny83q2322rc3u3yfbhqm19gg3swq>  
<[https://urldefense.proofpoint.com/v2/url?u=https-3A\\_\\_biaprotect.box.com\\_s\\_fkq3ny83q2322rc3u3yfbhqm19gg3swq&d=DQMFAg&c=qmi9WrYRGQEDDOxOwKrAjW7mWovpzN\\_EKyRbeK\\_zbP0&r=vPTMTz6QD2cY15xod5K5YCZswNI-jKYq5\\_T2Wv-prMm&m=6MUSdu41\\_5ZRqa2vKkqpNSZ3NzyEYh71-bAESmun-ml&s=tiCVtyGFOVIPsw3xT2Gp-F-RQlGw\\_9lqdl64KQKN3Fw&e=>](https://urldefense.proofpoint.com/v2/url?u=https-3A__biaprotect.box.com_s_fkq3ny83q2322rc3u3yfbhqm19gg3swq&d=DQMFAg&c=qmi9WrYRGQEDDOxOwKrAjW7mWovpzN_EKyRbeK_zbP0&r=vPTMTz6QD2cY15xod5K5YCZswNI-jKYq5_T2Wv-prMm&m=6MUSdu41_5ZRqa2vKkqpNSZ3NzyEYh71-bAESmun-ml&s=tiCVtyGFOVIPsw3xT2Gp-F-RQlGw_9lqdl64KQKN3Fw&e=>)

Password: %C;Av5MHx2

The files are in the "20161022" folder

Beg Bates

End Bates

BPVEFILTER-35-00000001

BPVEFILTER-35-00116876

BPV-17-01-00261495

BPV-17-01-00261495

Matthew B. Lerner

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<<http://www.nelsonmullins.com/utilities/newBIO-vCARD.cfm?id=352>>